

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RHONDA HALL,

Plaintiff,

v.

Civil Action No. 3:05-cv-30002-MAP

VERIZON COMMUNICATIONS, INC.,
and VERIZON NEW ENGLAND, INC.

Defendants.

**FINAL MOTION OF PLAINTIFF RHONDA HALL FOR AN
EXTENSION OF TIME TO FILE OPPOSITION TO FILE
OPPOSITION TO DEFENDANTS' MOTION *IN LIMINE***

The plaintiff respectfully moves this Court for an extension of time until Tuesday, May 22, 2007 to file her opposition to the defendants' motion *in limine*. As grounds for this motion, plaintiff states as follows:

1. The defendants have filed three separate motions. The first is a motion to disqualify plaintiff's counsel on the grounds that he is a necessary witness in this case. The second is a motion to submit to the court any federal claim for back pay. The scheduling of these two motions was the subject of an order of the court on April 5, 2007 following the Final Pretrial Conference in this matter.

2. The third motion filed by the defendants is a Motion *in Limine* to exclude Evidence of Carew Street Graffiti. Under the Court's original scheduling order, Motions *in Limine* were not due until a week before the trial in this matter. The trial is presently scheduled to begin on July 1, 2007, and plaintiff's counsel was not anticipating having to respond to a motion *in limine* at this early date.

3. The plaintiff has completed and filed her opposition to the first two of the defendants' motions.

4. Prior to May 3, 2007, plaintiff's counsel had been actively preparing for a two week trial in this court which was scheduled to proceed on Tuesday, May 8, 2007, and was continued to a date in June. Over the past week, plaintiff's counsel was diverted from completing the plaintiff's opposition to the motion *in limine* by unexpected emergent developments in this case involving the hospitalization of a critical witness with a serious illness which might render the witness unavailable for trial. Plaintiff's counsel was required to spend an inordinate amount of time attempting to obtain information about the medical status of this witness. Preparation for his son's graduation from college which will involve travel to Colorado between May 19 and May 21, 2007 has further interfered with plaintiff's counsel's ability to complete the plaintiff's opposition to the defendants' motion *in limine*.

5. Insofar as the trial in this matter is more than a month away, the extension sought in this motion would not be disruptive of the court's ability to rule on this or other evidentiary issues.

Respectfully submitted,
PLAINTIFF RHONDA HALL
By her Attorney,

Dated: May 18, 2007

/s/ Hugh D. Heisler
Hugh D. Heisler
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CERTIFICATE OF SERVICE

I, Hugh D. Heisler, hereby certify that a true copy of the foregoing Motion was served electronically upon the attorney of record for the Defendants on May 18, 2007.

/s/ Hugh D. Heisler
Hugh D. Heisler